# ROCKY FLATS CITIZENS ADVISORY BOARD

### MINUTES OF STUDY SESSION

March 15, 1999

FACILITATOR: Laura Till

Tom Marshall called the meeting to order at 6:35 p.m.

BOARD / EX-OFFICIO MEMBERS PRESENT: Carol Barker, Ray Betts, Shawn Burke, Eugene DeMayo, Joe Downey, Tom Gallegos, Mary Harlow, Victor Holm, Bill Kossack, Tom Marshall, Bryan Taylor / Mariane Anderson, Steve Gunderson, John Rampe

BOARD / EX-OFFICIO MEMBERS ABSENT: Alan Aluisi, Susan Barron, Tom Davidson, Gerald DePoorter, Derek Dye, Jim Kinsinger, Mary Mattson, LeRoy Moore, David Navarro, Linda Sikkema / Tim Rehder

PUBLIC / OBSERVERS PRESENT: Kenneth Werth (citizen); Tom Stewart (citizen); Alan Trenary (citizen); Mark Wickers (citizen); Brian Mathis (Kaiser-Hill); Pat Cummins (citizen); John Corsi (Kaiser-Hill); Ken Korkia (CAB staff); Erin Rogers (CAB staff); Deb Thompson (CAB staff); Brady Wilson (CAB staff)

### **PUBLIC COMMENT PERIOD:**

Comment: Mark Wickers: As a local citizen, I am concerned about the release of harmful dust into the air during demolition of possibly contaminated buildings/structures at Rocky Flats during the next couple of years. I have a few questions for DOE and their contractors. 1) What are the scientific criteria for determining whether a building or structure needs to be decontaminated before demolition? 2) What is your process for decontaminating these buildings/structures? 3) Then what are the scientific criteria for deciding the structures are acceptable to be demolished? These questions are written up for your review and response.

Response: John Rampe: We can also provide a written response. 1) For radionuclides, we adhere to the standard for plutonium we've been talking about, which is the Nuclear Regulatory Commission's free release criteria. That is 100 disintegrations per minute per 100 square centimeters for contamination. If the interior of the building exceeded those criteria, we would then decontaminate. We also do decontamination for other reasons such as worker safety. Other criteria are also used depending on the type of hazardous substance encountered. 2) In general, the process for decontamination is to first characterize the area, and then pick from various decontamination techniques, depending on the level and nature of contamination. 3) To determine if a building is safe for demolition, after we have completed decontamination, we re-analyze and re-survey to ensure the levels have in fact been met. If not, the process is repeated. The regulators become involved at that point, and we would refer to a demolition plan that has the criteria necessary to provide the state and EPA with the results of our analyses. Then they give us approval to begin demolition.

Comment: Alan Trenary: I feel that putting the concrete rubble back into the foundations of

ADMIN RECORD

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these buildings makes sense. This is the standard used throughout the country and the nuclear complex. We stand around and quibble about whether this approach is good enough, but the rest of the country is moving on these same things. Perhaps they will wash their hands of us and tell us to deal with it on our own. Lofty ideals are wonderful, but we also have to deal with the priorities of the nation as a whole. Right now we're in the spotlight. DOE wants to get going on this, and if we stand around and quibble about something they've already made their minds up about, there's a good chance they will walk away from us.

**DISCUSSION AND DEVELOPMENT OF CAB RECOMMENDATION ON BUILDING RUBBLE:** The Board first received a presentation on building rubble disposition options at its February 4 meeting. During the course of D&D activities, the site expects to generate about 111,000 cubic meters of clean building rubble. Clean rubble is defined as meeting sanitary landfill criteria and free release criteria. The site's favored option for disposition of building rubble is to fill two building foundations (Buildings 371 and 771) — after the buildings are demolished — with the clean rubble generated onsite.

Based on that initial presentation, the Board formulated many questions, comments and concerns and asked the site to address each of those issues. At its February 16 meeting, John Rampe with DOE returned to address those questions and comments. Also at that meeting, CAB began an in-depth discussion of viewpoints and issues each member had about the proposed alternatives for building rubble disposition. Their individual concerns ranged from characterization of contamination in the rubble, to issues about under-building contamination, to the free release standard and why that would be used to determine whether the rubble was "clean." The Board agreed on a few key points, and developed some new remaining issues to see addressed before it felt comfortable approving the site's plans. With that information, CAB staff was asked to prepare a draft recommendation, or decision statement, by the Board on building rubble issues.

CAB devoted its entire agenda at this meeting to continuing its discussion on, and trying to finalize recommendation language to forward to DOE. Staff drafted a recommendation/decision statement that stated the following:

- The Board supports disposition of clean building rubble as fill material in the foundations of Buildings 771 and 371, provided DOE and its contractors can demonstrate the standard used is sufficiently protective of the environment, communities, and any future site occupants.
- CAB supports the use of Smart Characterization and Decontamination to locate concrete contamination for removal before buildings are demolished.
- The site must ensure that under-building contamination is adequately characterized and remediated before the foundations of Buildings 771 and 371 are filled with rubble.
- Staged rubble (rubble awaiting disposition in the foundations of Buildings 771 and 371) must be thoroughly cleaned of dust to prevent off-site transport via wind to surrounding communities.
- To ensure that the characterization and remediation of under-building contamination is adequate, CAB and the community must have an opportunity to be involved in developing both the Industrial Area Characterization Strategy and the Environmental Restoration Strategy.

The Board still had concerns about what it felt were some key issues, such as: needing more

clarification of the free release standard versus using average background figures; the specific volume of contaminants; what impact the buried rubble may have on groundwater; and removal of any hot spots that may exist in the staged rubble. CAB asked staff to do a little more research into average background levels, to compare with free release standards. Based on some of the Board member's concerns and comments at this meeting, staff will rewrite the recommendation/decision statement as a letter to DOE, and email/forward a copy to Board members for their review prior to the April 1 meeting. CAB hopes to be able to approve the final language at that time.

### **NEXT MEETING:**

**Date:** April 1, 1999, 6 - 9:30 p.m. (work session)

**Location:** College Hill Library (Front Range Community College), 3705 West 112<sup>th</sup> Avenue, Westminster

Agenda: Final approval of building rubble recommendation/decision statement; discussion of Board vision process; review and approval of AMS TRG contract

## **ACTION ITEM SUMMARY: ASSIGNED TO:**

- 1. Revise building rubble recommendation/decision statement for CAB review Brady Wilson
- 2. Research average background levels for Colorado/Front Range (include review of Tom Dupont's materials on background radiation levels) Brady Wilson

#### **MEETING ADJOURNED AT 9:10 P.M. \***

(\* Taped transcript of full meeting is available in CAB office.)

## **RESPECTFULLY SUBMITTED:**

Mary Harlow, Secretary Rocky Flats Citizens Advisory Board

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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